

REMARKS/ARGUMENTS

Claims 1, 2, 4-17, 19-20, 22, 31-32, 34-47, 49-50 and 52 were presented for examination of which Claims 1 and 31 are independent. All claims are rejected under 35 U.S.C. § 102(e). Applicants traverse this rejection and submit that the pending claims are in a condition for allowance. Thus, Applicants respectfully request reconsideration and withdrawal of all rejections levied against the pending claims.

Specification Objections

In response to the Examiner's Specification objections, Applicants submit with this response a Substitute Specification. Applicants respectfully submit that this Substitute Specification addresses all informalities objected to by the Examiner, and that this Substitute Specification contains no new matter.

Regarding the Examiner's objection to the proposed amended title "System and Method for Assigning Unique Identifiers to Programs Executing on Computers," Applicants thank the Examiner for his suggestion but respectfully submit that this title is sufficiently descriptive of the claimed invention. The title need only be "brief but technically accurate and descriptive." *See e.g.* MPEP 606. A title reciting "...Programs Executing on Computers" is descriptive of the claimed invention which recites a first program invoked by a user and a second program invoked by the user. Thus, Applicants respectfully submit that the title complies with all formalities and request that the Examiner withdraw all Specification objections.

Rejections Under 35 U.S.C. § 102(e)

Claims 1, 2, 4-17, 19, 20, 22, 31, 32, 34-47, 49, 50 and 52 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Publication No. 2005/0097179 to Orme et al. (hereinafter "Orme.") Applicants submit that Claims 1, 2, 4-17, 19, 20, 22, 31, 32, 34-47, 49, 50 and 52 as previously presented are patentable over Orme.

A reference anticipates a claimed invention only when that reference discloses each and every element of the claimed invention. Applicants submit that Orme does not disclose: selecting from a plurality of network identifiers allocated to a user, assigning a selected network

identifier of a user to a program invoked by that user. Each of these elements is required in each independent claim, e.g. Claims 1 and 31.

Applicants wish to first point out that Orme does not disclose a plurality of network identifiers allocated to a user. Although Orme may describe an IP address of a user, Orme does not disclose a plurality of network identifiers allocated to a user. *See* Orme, paragraph 44. Even more, Orme does not disclose or suggest selecting from a plurality of network identifiers allocated to a user. Orme assigns an IP address from a group of IP addresses ranging from 127.0.0.1 to 127.255.255.255, or from a subnet, or from a group of IP addresses not already assigned to a local host computer or code segment. *See* Orme, paragraphs 920-921. **None** of these groups are a group of network identifiers allocated to a user, furthermore Orme never discloses or suggests that the above-described IP addresses are allocated to a user. Thus, Orme does not disclose the limitation *selecting from a plurality of network identifiers allocated to a user.*

In addition to not disclosing a plurality of network identifiers allocated to a user, Orme also does not disclose assigning a selected network identifier of a user to a program invoked by that user. As stated in the Response filed on September 9, 2009, and reiterated here with emphasis, Orme does not disclose assigning a network identifier to a program, where that network identifier is allocated to a user, and where the program is invoked by the user. The system described in Orme includes code segments or programs that are assigned IP addresses. As stated above, Orme never discloses or suggests that the IP address assigned to a code segment is in any way associated with a user. Similarly, Orme never discloses or suggests that the code segment is invoked by a user or that the code segment has a network identifier associated with a user that invokes the code segment. Thus, Orme does not disclose the following limitations: *assigning the first network identifier to the first program, and assigning the second network identifier to the second program*, where the identifiers are *an identifier of the user for a first program invoked by the user, and an identifier of the user for a second program invoked by the user.*

Applicants wish to clarify the record by pointing out that the Examiner's statements about Orme lack support because Orme never discloses allocating a user "at least two IP addresses to choose from when assigning one IP address to one section of code ... and another different IP address to the other section of code." *See* Office Action, mailed on December 16,

2009, page 5. Orme never discloses or even suggests that a user chooses an IP address, or that a user assigns an IP address to a section of code. What is more, Orme is entirely silent as to who or what assigns an IP address to a section of code.

In light of the above remarks, Applicants submit that Claims 1 and 31 are patentable over Orme because Orme does not disclose each and every limitation of the claimed invention. Applicants further submit that Claims 2, 4-17, 19, 20, 22, 32, 34-47, 49, 50 and 52 are patentable over Orme because these claims depend on and incorporate the patentable subject matter of Claims 1 and 31. Accordingly, Applicants earnestly request that the Examiner withdraw this rejection and pass the claims to issuance.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application, the Examiner is urged to contact Applicants' agent at the telephone number identified below.

Respectfully submitted,
CHOATE, HALL & STEWART LLP

Date: March 16, 2010

/Kellan D. Ponikiewicz/

Kellan D. Ponikiewicz

Registration Number: 59,701

Patent Group
CHOATE, HALL & STEWART LLP
Two International Place
Boston, MA 02110
Phone: (617) 248-4771
Fax: (617) 502-5002